

# *EXHIBIT 4*

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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC.

**Plaintiff,**

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC.

### Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S  
SUPPLEMENTAL INITIAL  
DISCLOSURES**

1 Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure Plaintiff Waymo LLC  
 2 (“Waymo”) hereby provides the following Supplemental Initial Disclosures to Defendants Uber  
 3 Technologies, Inc. (“Uber”), Ottomotto LLC (“Ottomotto”), and Otto Trucking LLC (“Otto”)  
 4 (individually or collectively, “Defendants”).

5 **GENERAL OBJECTIONS AND LIMITATIONS**

6 Waymo makes these Initial Disclosures based on the information reasonably available to it as  
 7 of the present date. Waymo reserves the right to supplement, amend, modify, or alter these  
 8 disclosures as new information becomes available. These disclosures represent a good-faith effort to  
 9 identify information that Waymo reasonably believes it may use to support one or more of its various  
 10 claims or defenses. By making the following disclosures, Waymo does not represent that every  
 11 individual or entity identified herein necessarily possesses such information or that the individual or  
 12 entity possesses relevant information. Nor does Waymo represent that it is identifying every  
 13 document, tangible thing, or witness it may use to support its claims or defenses. Waymo employees  
 14 may only be contacted through Waymo’s counsel. Waymo reserves the right to amend these  
 15 disclosures as additional information becomes available, through discovery or otherwise. Waymo also  
 16 reserves the right to call any witness, including the right to identify expert witnesses, or present any  
 17 exhibit or item at trial not listed herein but determined through discovery, investigation, or otherwise  
 18 to support its claims or defenses.

19 By making these Initial Disclosures, Waymo does not waive its right to object to discovery of  
 20 any information based on disclosures herein on the grounds of the attorney-client privilege, work-  
 21 product doctrine, or any other applicable privilege, immunity, law, or rule. Nor does Waymo waive  
 22 its right to assert any other objection authorized by the Federal Rules of Civil Procedure or any other  
 23 applicable rule or law in response to interrogatories, requests for admission, requests for production of  
 24 documents, questions at depositions, or any other discovery requests involving or relating to the  
 25 subject matter of these disclosures.

26 All of the disclosures set forth below are made subject to the above objections and  
 27 qualifications.

28

1     **I. Individuals (Fed. R. Civ. P. 26(a)(1)(A)(i))**

2       Waymo identifies the following individuals likely to have discoverable information that  
 3 Waymo may use to support its claims or defenses. Waymo reserves the right to supplement or amend  
 4 this disclosure pursuant to Rule 26(e) of the Federal Rules of Civil Procedure if additional individuals  
 5 or subjects are identified. The following list shall not be interpreted to be an admission that any of the  
 6 listed individuals will have discoverable information.

7       All communications with the individuals listed below for which “Quinn Emanuel Urquhart &  
 8 Sullivan, LLP; 50 California Street, 22nd Floor; San Francisco, California 94111” is listed as the  
 9 address should be made through Waymo’s counsel of record. To the extent that Waymo currently is  
 10 aware of the contact information for any disclosed individual, it has been provided below.

11       By indicating the general subject matter of information these individuals may possess,  
 12 Waymo is in no way limiting its right to call any individual listed to testify concerning other  
 13 subjects.

Name	Contact Information	Connection to the Case	Subject
Gary Brown	May be reached through counsel for Waymo.  Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600	Google Inc. (“Google”) employee	Matters that concern the forensic investigation into misappropriation of trade secrets by Defendants via Anthony Levandowski, Sameer Kshirsagar, and Radu Raduta.

Name	Contact Information	Connection to the Case	Subject
Pierre-Yves Droz	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee; named inventor	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; the design and development of certain of Waymo's asserted trade secrets; conception, reduction to practice, and patenting of the inventions of U.S. Patent Nos. 8,836,922 ("the '922 patent"), 9,285,464 ("the '464 patent"), 9,368,936 ("the '936 patent"), and 9,086,273 ("the '273 patent").
William Grossman	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern Waymo's accidental receipt of an email containing an Otto LiDAR PCB.
Michael Janosko	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Google employee	Matters that concern reasonable measures to protect the security of Google and Waymo's enterprise infrastructure.

Name	Contact Information	Connection to the Case	Subject
Tim Willis	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern Waymo's supply chain operations, including reasonable steps taken to protect confidential and proprietary information shared with suppliers and misappropriation of trade secrets by Defendants via Sameer Kshirsagar and Radu Raduta.
Gregory Kintz	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Technical expert for Waymo	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Ron Medford	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern Waymo's regulatory submissions and safety of its self-driving cars.

Name	Contact Information	Connection to the Case	Subject
Daniel Chu	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern Waymo, including investment in, development of, and management of Waymo's self-driving cars and autonomous vehicle technology; the current and future nature of the relevant markets and competition in the relevant markets, and other issues related to irreparable harm and damages suffered by Waymo.
Ben Ingram	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; , the design and development of certain of Waymo's asserted trade secrets.
Luke Wachter	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; the design and development of certain of Waymo's asserted trade secrets.

Name	Contact Information	Connection to the Case	Subject
Sean Noyce	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern Waymo's supply chain operations, including reasonable steps taken to protect confidential and proprietary information shared with suppliers and misappropriation of trade secrets by Defendants via Sameer Kshirsagar and Radu Raduta.
Jai Krishnan	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern Waymo's supply chain operations, including reasonable steps taken to protect confidential and proprietary information shared with suppliers and misappropriation of trade secrets by Defendants via Anthony Levandowski, Sameer Kshirsagar, and Radu Raduta.

Name	Contact Information	Connection to the Case	Subject
Drew Ulrich	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee; named inventor	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; the design and development of certain of Waymo's asserted trade secrets; conception, reduction to practice, and patenting of the inventions of the '922 and '464 patents.
Zachary Morris	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee; named inventor	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; the design and development of certain of Waymo's asserted trade secrets; conception, reduction to practice, and patenting of the inventions of the '922, '464, and '273 patents.

Name	Contact Information	Connection to the Case	Subject
Darel Ionut Iordache	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee; named inventor	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; the design and development of certain of Waymo's asserted trade secrets; conception, reduction to practice, and patenting of the invention of the '273 patent.
Bernard Fidric	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; the design and development of certain of Waymo's asserted trade secrets.
Blaise Gassend	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; the design and development of certain of Waymo's asserted trade secrets.

Name	Contact Information	Connection to the Case	Subject
Dan McCloskey	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including radar; the design and development of certain of Waymo's asserted trade secrets.
Dmitri Dolgov	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee	Matters that concern Waymo, including the history, development, and management of Waymo's self-driving cars and autonomous vehicle technology; the design and development of certain of Waymo's asserted trade secrets.
Sam Lenius	<p>May be reached through counsel for Waymo.</p> <p>Quinn Emanuel Urquhart &amp; Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 415-875-6600</p>	Waymo employee; named inventor	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; the design and development of certain of Waymo's asserted trade secrets; conception, reduction to practice, and patenting of the invention of the '936 patent.

Name	Contact Information	Connection to the Case	Subject
Bryan Salesky	Argo AI, LLC 40 24 <sup>th</sup> St. Pittsburgh, Pennsylvania 15222	Former Google employee	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology; matters that concern misappropriation of trade secrets by Defendants.
Chris Urmson	Aurora Innovation, Inc. 429 Acacia Avenue Palo Alto, California 94306	Former Google employee	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; matters that concern misappropriation of trade secrets by Defendants.
Sebastian Thrun	Computer Science Department Stanford University 353 Serra Mall Gates Building 154 Stanford, California 94305	Former Google employee	Matters that concern the development and operation of Waymo's self-driving cars and autonomous vehicle technology, including LiDAR; matters that concern misappropriation of trade secrets by Defendants.

Name	Contact Information	Connection to the Case	Subject
Anthony Levandowski	May be contacted through his counsel of record:  Ramsey & Ehrlich LLP 803 Hearst Ave Berkeley, California 94710	Former Google employee; former employee of Defendants; named inventor	Matters that concern misappropriation of trade secrets and patent infringement by Defendants; conception, reduction to practice, and patenting of the inventions of the '922 and '464 patents.
Gaetan Pennecot	May be contacted through Defendant Uber and Otto's counsel of record	Former Google employee now employed by Defendants; named inventor	Matters that concern misappropriation of trade secrets and patent infringement by Defendants; conception, reduction to practice, and patenting of the inventions of the '922, '464, and '273 patents.
Daniel Gruver	May be contacted through Defendant Uber and Otto's counsel of record	Former Google employee now employed by Defendants; named inventor	Matters that concern misappropriation of trade secrets and patent infringement by Defendants; conception, reduction to practice, and patenting of the inventions of the '922, '464, and '273 patents.
Travis Kalanick	May be contacted through Defendant Uber and Otto's counsel of record	Former Uber Chief Executive Officer; Member, Uber Board of Directors	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.

Name	Contact Information	Connection to the Case	Subject
Sameer Kshirsagar	On information and belief, may be contacted through Defendant Uber and Otto's counsel of record	Former Google employee now employed by Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Radu Raduta	<p>May be reached through counsel.</p> <p>Ethan Jacobs Holland Law LLP 220 Montgomery Street, Suite 800 San Francisco, California 94104 415-200-4984</p>	Former Google employee; former employee of Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Individual(s) most knowledgeable about the development and operation of Defendants' self-driving technology, including its LiDAR systems	Unknown	Employees of Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
James Haslim	May be contacted through Defendant Uber and Otto's counsel of record	Employee of Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Scott Boehmke	May be contacted through Defendant Uber and Otto's counsel of record	Employee of Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Lior Ron	May be contacted through Defendant Uber and Otto's counsel of record	Former Google employee now employed by Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Colin Sebern	May be contacted through Defendant Uber and Otto's counsel of record	Former Google employee now employed by Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.

Name	Contact Information	Connection to the Case	Subject
Don Burnette	May be contacted through Defendant Uber and Otto's counsel of record	Former Google employee now employed by Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Soren Juelsgaard	May be contacted through Defendant Uber and Otto's counsel of record	Former Google employee now employed by Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Claire Delauney	May be contacted through Defendant Uber and Otto's counsel of record	Former Google employee now employed by Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Max Levandowski	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
Asheem Linaval	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
David Meall	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets.
Rhian Morgan	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets.
Mason Feldman	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets.
John Bares	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets.

Name	Contact Information	Connection to the Case	Subject
Cameron Poetscher	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets.
Nina Qi	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets.
Rhian Morgan	May be contacted through Defendant Uber and Otto's counsel of record	Uber employee	Matters that concern misappropriation of trade secrets.
Brian McClendon	On information and belief: 30 Coyote Hill Portola Valley, California 94028-8017	Former Google employee now employed by Defendants	Matters that concern misappropriation of trade secrets and patent infringement by Defendants.
John Gardner	May be contacted through counsel.  Merri A. Baldwin Rogers Joseph O'Donnell, a Professional Law Corporation 311 California Street, 10 <sup>th</sup> Floor San Francisco, California 94104	Anthony Levandowski's attorney, involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern misappropriation of trade secrets.
Kevin Faulkner	Stroz Friedberg LLC 32 Avenue of the Americas, 4th Floor New York, New York 10013	Stroz Friedberg employee involved in Uber's forensic investigation in this litigation	Matters that concern the misappropriation of trade secrets.
Judith Branham	Stroz Friedberg LLC 330 Second Avenue South, Suite 335 Minneapolis, Minnesota 55401	Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Scott Brown	Stroz Friedberg LLC 2 Oliver Street, 11th Floor Boston, Massachusetts 02109	Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.

Name	Contact Information	Connection to the Case	Subject
Hanley Chew	Fenwick & West LLP 801 California Street Mountain View, California 94041	Former Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Eric Friedberg	Stroz Friedberg LLC 32 Avenue of the Americas, 4th Floor New York, New York 10013	Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Mary Fulginiti	Stroz Friedberg LLC 1925 Century Park East, Suite 1350 Los Angeles, California 90067	Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Melanie Maugeri	Stroz Friedberg LLC 101 Montgomery Street, Suite 2200 San Francisco, California 94104	Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Mitchell Dobi	Stroz Friedberg LLC 32 Avenue of the Americas, 4th Floor New York, New York 10013	Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Cristina Antalik	Stroz Friedberg LLC 2 Oliver Street, 11th Floor Boston, Massachusetts 02109	Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Jessica Madore	Stroz Friedberg LLC 1925 Century Park East, Suite 1350 Los Angeles, California 90067	Stroz Friedberg employee involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.

Name	Contact Information	Connection to the Case	Subject
Stroz Friedberg LLC	Stroz Friedberg LLC c/o CSC-Lawyers Incorporating Service 2710 Gateway Oaks Drive, Suite 150N Sacramento, California 95833	Involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Morrison & Foerster LLP	Morrison & Foerster LLP 425 Market Street San Francisco, California 94105	Involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Defendants' Law Firms	May be contacted through Defendants' counsel of record.	Involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Individuals identified in Defendants' privilege logs	May be contacted through Defendants' counsel of record	Involved in Uber's acquisition of Otto and the purported due diligence of Otto	Matters that concern the misappropriation of trade secrets.
Individuals identified by Defendants in response to Court Ordered Interrogatory No. 2	May be contacted through Defendants' counsel of record	Involved in LiDAR related discussions with Anthony Levandowski	Matters that concern the misappropriation of trade secrets.
Individuals to be identified by Uber in its required accounting pursuant to the Court's preliminary injunction order	May be contacted through Defendants' counsel of record	Involved in Uber's acquisition of Otto, the purported due diligence of Otto, and LiDAR related discussions with Anthony Levandowski	Matters that concern the misappropriation of trade secrets.

In addition to the individuals identified above, Waymo incorporates by reference the witnesses and their possible subjects of testimony disclosed by Defendants in their Initial Disclosures and any amended Initial Disclosures, as well as those individuals identified by Defendants through discovery, declaration, or other means, those individuals whose names appear on produced documents as if set forth in full herein, and those individuals deposed or to be deposed in this case. Waymo has not yet identified all expert witnesses upon whose opinions and testimony it may rely in this matter.

1           **II. Documents, Electronically Stored Information, and Tangible Things (Fed. R. Civ. P.**  
 2           **26(a)(1)(A)(ii))**

3           The categories and locations, where known, of non-privileged documents, electronically stored  
 4           information, and tangible things in Waymo's possession, custody, or control that Waymo may use to support its claims or defenses include:

<b>Category</b>	<b>Location(s)</b>
Documents relating to and supporting Waymo's claims as set forth in Waymo's Amended Complaint	Waymo LLC Google Inc. Quinn Emanuel Urquhart & Sullivan, LLP
Documents relating to the design and operation of the Waymo self-driving project and its LiDAR systems, including technical documents and Waymo's source code, which will be made available for inspection	Waymo LLC Google Inc. Quinn Emanuel Urquhart & Sullivan, LLP
Documents relating to the Waymo Asserted Patents (U.S. Patent Nos. 8,836,922, 9,285,464, 9,368,936, and 9,086,273), their prosecution histories, the cited prior art, and design and development documents for the patented inventions	Waymo LLC Google Inc. Quinn Emanuel Urquhart & Sullivan, LLP
Documents regarding Defendants' Accused Products, to the extent any are in Waymo's possession	Quinn Emanuel Urquhart & Sullivan, LLP
Documents relating to Waymo's trade secrets and confidential information and the policies related thereto	Waymo LLC Google Inc. Quinn Emanuel Urquhart & Sullivan, LLP
Documents relating to or created by each Waymo employee who has left Waymo for Defendants, including Anthony Levandowski, Gaetan Pennecot, Daniel Gruver, Sameer Kshirsagar, and Radu Raduta	Waymo LLC Google Inc. Quinn Emanuel Urquhart & Sullivan, LLP
Communications between any Waymo employee who has left Waymo for Defendants (including Anthony Levandowski, Gaetan Pennecot, Daniel Gruver, Sameer Kshirsagar, and Radu Raduta) and Defendants or any other current or former Waymo employee relating to Defendants	Waymo LLC Google Inc. Quinn Emanuel Urquhart & Sullivan, LLP

26           In addition to the above-identified categories of documents, Waymo incorporates by reference  
 27           the categories of documents disclosed by Defendants in their Initial Disclosures and any amended  
 28           Initial Disclosures, and any documents identified by Defendants through discovery, declaration, or

1 other means.

2 Waymo expressly reserves the right to supplement this response under Rule 26(e) of the  
 3 Federal Rules of Civil Procedure as its investigation continues.

4 **III. Damages (Fed. R. Civ. P. 26(a)(1)(A)(iii))**

5 Waymo believes it has suffered and is suffering irreparable harm as a result of Defendants'  
 6 trade secret misappropriation and patent infringement. In addition, Waymo believes it is entitled to  
 7 damages for Defendants' trade secret misappropriation, as well as Defendants' patent infringement,  
 8 including damages based on a calculation of lost profits or an amount no less than a reasonable  
 9 royalty. In connection with these calculations, Waymo may rely on its estimates of future profits and  
 10 cash flows; its assessments and projections regarding the relevant markets, competition therein, and its  
 11 competitive position; and its investment in LiDAR technology (in time, capital, engineering costs, and  
 12 other expenditures). Waymo also expects to rely on materials that are being or will be produced by  
 13 Uber and third parties.

14 Waymo further seeks a judgment that this case is exceptional and an award of Waymo's costs  
 15 and reasonable attorneys' fees. Waymo also seeks an accounting of all sales and revenues, together  
 16 with pre-judgment and post-judgment interest. Waymo further seeks enhanced damages for  
 17 Defendants' willful and malicious conduct in misappropriating Waymo's trade secrets, punitive  
 18 damages, and other relief including but not limited to disgorgement of profits from unjust enrichment.  
 19 Waymo seeks any other relief available under applicable law. It would be premature to estimate the  
 20 amount of damages at this time.

21 Waymo reserves the right to supplement, modify or add to this response as circumstances  
 22 dictate and in accordance with the Federal Rules and order issued by the Court.

23 **IV. Insurance Agreements (Fed. R. Civ. P. 26(a)(1)(A)(iv))**

24 Waymo is not aware of any insurance agreement under which any person carrying on an  
 25 insurance business may be liable to satisfy part or all of a judgment which may be entered in the  
 26 action or to indemnify or reimburse for payments made to satisfy the judgment.

27 Waymo expressly reserves the right to supplement its responses pursuant to Rule 26(e) of the  
 28 Federal Rules of Civil Procedure as its investigation continues.

1  
2 DATED: June 21, 2017

3 QUINN EMANUEL URQUHART & SULLIVAN, LLP

4 By /s/ Charles K. Verhoeven  
5 Charles K. Verhoeven  
Attorneys for Plaintiff Waymo LLC

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